

Exhibit 1

Proposed Order Granting Class Certification

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAMES GINZKEY, RICHARD
FITZGERALD, CHARLES CERF, BARRY
DONNER, and on behalf of the class
members described below,

Plaintiffs,

v.

NATIONAL SECURITIES
CORPORATION, a Washington Corporation

Defendant.

Case No.: 2:18-cv-1773-RSM

**[PROPOSED] ORDER GRANTING
CLASS
CERTIFICATION**

WHEREAS, THIS MATTER came before the Court on Plaintiffs' Motion for Class Certification;

WHEREAS, THE COURT considered the parties' briefs, declarations and arguments and is duly informed;

NOW, THEREFORE, THE COURT ORDERS THAT the motion is GRANTED; and
FURTHER ORDERS THAT:

1. That the Class and Subclasses described in Plaintiffs' brief each be certified as a class under Fed. R. Civ. P. 23(b)(3);

2. That the following persons or entities are excluded from the Class or Subclasses: “Excluded from the Class or Subclasses are Defendant and any of its officers, directors, employees, agents, parents, affiliates or subsidiaries. Also excluded is any entity related to or affiliated with Beamreach, and any judicial officers presiding over this matter and their immediate family members.”

3. That Plaintiffs, James Ginzkey, Richard Fitzgerald, Charles Cerf, and Barry Donner are designated and appointed as representatives for the Class and the Subclasses;

4. That Stoltmann Law Offices, P.C. and Law Offices of Joshua B. Kons, LLC are appointed as counsel for the Class and Subclasses; and

5. That no later than thirty (30) days from the date of this order, Plaintiffs shall submit to Defendant’s counsel the proposed Notice forms and the Plan for disseminating Notice to the Class and Subclasses. Counsel shall then confer as to the proposed Notice and Plan. The parties shall submit an agreed Notice and Plan to the court. If the parties are not in agreement, each will submit their proposed Notice and Plan to the court for decision.

Dated this ____ day of _____, 20__.

HON. RICARDO S. MARTINEZ
United States District Judge

“Presented by”
Dated this 3rd day of November, 2020

By: /s/ David Neuman
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